

Pursuant to Local Rule 6-2, Plaintiff and Counterclaim Defendant Freescale Semiconductor, Inc. ("Freescale") and Defendant and Counterclaimant ChipMOS Technologies, Inc. ("ChipMOS") jointly submit this Stipulated Request for an extension of time to file and serve their Opposition and Reply briefs regarding ChipMOS' Motion for Reconsideration.

The dates for filing the Response and the Reply were set by the Court's Order filed September 22, 2011 [Docket No. 156]. Under the September 22, 2011 Order, ChipMOS' opening brief is currently due on October 17, 2011, Freescale's Opposition is currently due on October 31, 2011, and ChipMOS' Reply is currently due on November 7, 2011. The parties have agreed to extend the dates for Freescale's Opposition and ChipMOS's Reply. The parties' proposed revised briefing schedule is as follows:

ChipMOS' Opening Brief: October 17, 2011

Freescale's Opposition Brief: November 7, 2011

ChipMOS's Reply Brief: November 14, 2011

This request for an extension is supported by the Declaration of Shanée Y. W. Nelson being filed herewith.

DATED: September 27, 2011

Respectfully submitted,

COOLEY LLP
RONALD S. LEMIEUX
VID R. BHAKAR
SHANÉE Y.W. NELSON

By: /s/ Shanée Y. W. Nelson

SHANÉE Y. W. NELSON

Attorneys for Defendant and Counterclaimant
ChipMOS Technologies, Inc.

In accordance with General Order No. 45, Section X(B), the above signatory attests that concurrence in the filing of this document has been obtained from the signatory below.

1 DATED: September 27, 2011

JONES DAY
GREG L. LIPPETZ
JACQUELINE K. S. LEE

3 By: /s/ Jacqueline K. S. Lee

4 JACQUELINE K. S. LEE

5 Attorneys for Plaintiff and Counterclaim-Defendant
6 Freescale Semiconductor, Inc.

DECLARATION OF SHANÉE Y. W. NELSON

I, Shanée Y. W. Nelson, declare

1. I am an attorney at the law firm of Cooley LLP, counsel in this action for Defendant and Counterclaimant ChipMOS Technologies, Inc. (“ChipMOS”). I have personal knowledge of the facts contained within this declaration, and if called as a witness, could testify competently to the matters contained herein.

2. On Friday, September 23, 2011 I contacted Jacqueline Lee, counsel for Freescale, requesting Freescale’s agreement to modify the briefing schedule set by the Court’s September 22, 2011 Order to accommodate the international travel schedule of Ron Lemieux, counsel for ChipMOS. Mr. Lemieux’s travel plans were booked several weeks prior to the Court’s Order.

3. The parties have conferred and agreed to an extension of time to file the Opposition and Reply briefs regarding ChipMOS’ Motion for Reconsideration pursuant to the schedule requested in the Stipulated Request.

4. There have been no previous modifications to the briefing schedule set in the Court’s September 22, 2011 Order.

5. The requested time modification will have no effect on any other deadlines set by the Court or on the schedule for this case.

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct. Executed on September 27, 2011 in Palo Alto, California.

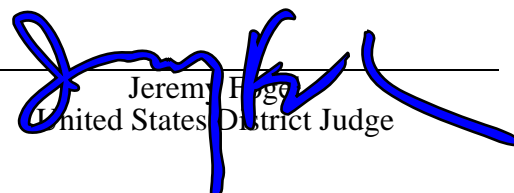
/s/ Shanée Y. W. Nelson

Shanée Y. W. Nelson

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: U&q à^!Â, 2011



Jeremy Fogel
United States District Judge